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Marc Baier, Ryan Adams, and Daniel Gericke*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

**LOUJAIN HATHLOUL  
ALHATHLOUL,**

Plaintiff,

vs.

**DARKMATTER GROUP, MARC  
BAIER, RYAN ADAMS, AND DANIEL  
GERICKE,**

Defendants.

No. 3:21-cv-01787-IM

**SECOND JOINT UNOPPOSED MOTION  
FOR EXTENSION OF TIME FOR  
DEFENDANTS DARKMATTER GROUP,  
MARC BAIER, RYAN ADAMS, AND  
DANIEL GERICKE TO ANSWER AND/OR  
OTHERWISE RESPOND TO  
PLAINTIFF'S COMPLAINT**

## **LOCAL RULE 7-1 CERTIFICATION**

The undersigned counsel certify that counsel for Defendant DarkMatter and counsel for the Individual Defendants have conferred with Plaintiff's counsel, and Plaintiff does not oppose this motion.

## **JOINT MOTION**

Defendants DarkMatter Group ("DarkMatter"), Marc Baier, Ryan Adams, and Daniel Gericke, ("Individual Defendants," and collectively, "Defendants") by and through their undersigned counsel, hereby submit this Joint Unopposed Motion for Extension of Time to Answer and/or Otherwise Respond to Plaintiff's Complaint. Defendants seek an extension of one day to answer and/or otherwise respond to Plaintiff's Complaint. The current deadline for Defendants to file their Answer is May 30, 2022, which is a "Legal holiday;" Fed. R. Civ. P. 6(a)(6)(A); but which, in this instance, does not automatically roll forward to the next day. *Cf.* Fed. R. Civ. P. 6(a)(1) (date rolls forward only when the deadline is stated in a period of days, not when a specific date is provided by Court order).

Defendants filed their first Joint Unopposed Motion for Extension of Time to Answer and/or Otherwise Respond to Plaintiff's Complaint on March 10, 2022, which requested an extension "up to and including May 30, 2022, to answer and/or otherwise respond to Plaintiff's Complaint." (ECF 17.) Defendants were unaware that May 30 is Memorial Day, a legal holiday. The Court granted that motion, ordering that the "Defendants' answer or other responsive pleading is now due by May 30, 2022." (ECF 23.) Defendants now request a one-day extension of time in which to answer or otherwise respond to Plaintiff's Complaint, which would make the Answer due on the next business day, Tuesday, May 31.

Good cause exists and Defendants respectfully request that the Court grant this unopposed motion to extend the time by one day for Defendants DarkMatter, Marc Baier, Ryan Adams, and Daniel Gericke to answer and/or otherwise respond to Plaintiff's Complaint. The

legal holiday makes it difficult to file a brief, as support personnel at Defendants' law firms are not available that day. This request is made in good faith and not for purposes of delay.

Dated this 18<sup>th</sup> day of May, 2022.

Respectfully submitted,

SNELL & WILMER L.L.P.

SCHWABE, WILLIAMSON & WYATT, P.C.

s/ Clifford S. Davidson (by permission)

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s/ Nika Aldrich

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